



June 11, 2014

Gary Epstein, Incentive Auction Task Force Chair
Mindel De La Torre, Chief, International Bureau
Julius Knapp, Chief, Office of Engineering and Technology
William Lake, Chief, Media Bureau
Roger Sherman, Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: *Expanding the Economic and Innovation Opportunities of Spectrum Through Incentive Auctions, GN Docket No. 12-268; Office of Engineering and Technology Releases and Seeks Comment on Updated OET-69 Software, ET Docket No. 13-26*

Dear Gary, Mindel, Julie, Bill and Roger:

On June 2, 2014, the Incentive Auction Task Force ("Task Force") released a Public Notice containing a staff analysis of potential new aggregate interference to television stations as a result of repacking.¹ The Public Notice indicates that "[t]o generate sufficient data from which to draw meaningful results, Commission staff performed 100 simulations using several variations of the approach we developed for creating simulated sets of stations to be repacked."² The output of these simulations identifies certain stations to relinquish their licenses and assigns channels to the remaining stations consistent with the pairwise interference constraint data.

The Public Notice states that the results in its attached Appendix are not exhaustive and invites parties to conduct their own simulations and aggregate interference analyses. To accomplish this task, and given the limited timeframe for comments and replies, the National Association of Broadcasters ("NAB") hereby requests that

¹ *Incentive Auction Task Force Releases Updated Constraint File Data Using Actual Channels and Staff Analysis Regarding Pairwise Approach to Preserving Population Served*, Public Notice, GN Docket No. 12-268, ET Docket No. 13-26, DA 14-677 (rel. June 2, 2014).

² *Id.* at 3.

the Task Force make available some number, if not all, of the 100 repacking scenarios simulations conducted by the staff, and cited in section 4.7 of the Appendix to the Public Notice. NAB understands that these scenarios were for analysis purposes only and that they randomly selected stations as flagged for participation in the simulated auction. Our aim in seeking these channel plans and results is to ensure that NAB's analysis can comport with the FCC results and ensure consistent technical comparisons can be made.

We believe that, by making this information available, the Commission will allow NAB and others to comment more meaningfully on the Public Notice and assist the Commission in its efforts to undertake a successful repacking during and following the incentive auction. Thank you for your time and consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read "Rick Kaplan", with a long horizontal flourish extending to the right.

Rick Kaplan
Executive Vice President, Strategic Planning